

March 1, 2011

Mr. Alan Holmes
Reports Analysis Division
Federal Election Commission

Identification Number: C30000368

RE: FEC Form 9, Filed 10/06/2010

Dear Mr. Holmes:

This submission is in response to your notice of review concerning the above referenced report.

The Committee filed FEC Form 9, an Electioneering Communications report on October 6, 2010 to disclose payment for broadcast media beginning on September 30, 2010. The Committee recognizes that the report was not timely filed.

In response the Committee has conducted a compliance review with staff concerning contributions and expenditures and has improved internal communications and controls. Specifically, the Committee has invested in process management software that will assist in tracking the internal decision-making process that precedes the determination to make or not make a political expenditure, as well as other categories of activity the Committee is engaged in. A feature of this comprehensive management software is the ability to trigger alerts and email notifications to staff and consultants involved in the accounting, compliance reporting and supervision of political expenditures from the time an expenditure is initially recommended, through the deliberation process, to the time that the expenditure is approved or declined. When a political expenditure is being considered, it is entered into the system. When the expenditure has been approved, the stage is changed to 'Approved.' This stage change causes a notification to be sent to all parties involved in the reporting process. Internal procedures now stipulate that a check cannot be cut until the expenditure is approved in the system. Once the check is cut, the stage is changed to 'Given' and a second notification goes out to all parties involved in the reporting process that includes the check number, date and amount.

In this way, the email notification and alert triggers provide the individuals responsible for accounts payables and compliance reporting a tickler list when political expenditures are anticipated so they can ensure that action is taken in a timely manner, as well as provide the appropriate feedback to management personnel so these individuals can ensure that all reporting will be and has been filed timely.

The process management software has been programmed and tested, and is operational at this time. It will be used for all political expenditures beginning in the first quarter of 2011.

Sincerely,
Mike Dunmyer

Mike Dunmyer
